

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 25698 & 25732

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' ONE HUNDRED FIRST
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED
AND/OR UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Kimberly A. Brown, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On September 25, 2024, the Debtors filed the *Debtors' One Hundred First (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 25698, redacted & 25732, sealed] (the “Objection”).
2. Pursuant to the Notice of Objection attached to the Objection [D.I. 25698-1 & 25732-1], any responses to the Objection were to be filed no later than November 11, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).
3. On October 21, 2024, Evgenii Wolfman (“Wolfman”) filed a response to the Objection [D.I. 27123] (the “Wolfman Response”).
4. On October 30, 2024, Lee Chia-Ju (“Chia-Ju”) filed a response to the Objection

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

[D.I. 27390] (the “Chia-Ju Response”).

5. On November 13, 2024, Raymond M. Rogers (“Rogers”) filed a response to the Objection [D.I. 27916] (the “Rogers Response”).

6. On November 25, 2024, Sean Glantz (“Glantz”) filed a response to the Objection [D.I. 28277] (the “Glantz Response”).

7. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the Debtors.

8. The Debtors are withdrawing the Objection solely with regard to the Rogers claim and claim numbers 94561, 13392, 9176, 48831 and 36326 without prejudice and with all rights of the parties reserved with regard thereto.

9. The Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as Exhibit A, to reflect the withdrawals and adjournments of the Objection solely as to the Wolfman, Chia-Ju, and Glantz claims. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as Exhibit B. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

10. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: December 26, 2024
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Kimberly A. Brown

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession